

Honorable Christopher M. Alston  
Chapter 7  
Hearing Date: November 17, 2022  
Time: 9:30 a.m.  
Hearing Location: Seattle, WA  
Response Date: November 10, 2022

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re:

UniEnergy Technologies LLC,

Debtor.

Case No. 21-11903-CMA

**MOTION OF TRUSTEE FOR  
ORDER AUTHORIZING  
TRUSTEE'S USE OF FUNDS OF  
THE ESTATE TO PAY PATENT  
MAINTENANCE FEES**

COMES NOW Edmund J. Wood as trustee (the "Trustee") of the bankruptcy estate of UniEnergy Technologies LLC ("Debtor"), by and through his attorneys Foster Garvey P.C. and Deborah A. Crabbe and hereby moves the Court pursuant to 11 U.S.C. §§ 704 and 541 for an order authorizing the Trustee to use funds of the bankruptcy estate to pay patent maintenance fees up to the sum of \$22,700.00.

The Debtor is the registered owner of patents with the United States Patent & Trademark Office as well as other patent registration offices, including the European Patent Convention, the Canadian Intellectual Property Office, IP Australia, South African Patent Office and Saudi

1 Authority for Intellectual Property. *See Declaration of Edmund J. Wood, hereinafter Wood Dec.*,  
2 ¶ 2.

3 The Debtor's pre-petition patent counsel, Emily Peyser, has advised that certain patent  
4 maintenance fees are coming due between November 20, 2022 and January 1, 2023. *See true*  
5 *and correct copy of email from Emily Peyser attached to the Wood Dec.* as **Exhibit A** and  
6 incorporated herein by this reference. It is the Trustee's understanding that routine maintenance  
7 fees are paid to patent offices where the Debtor has registered patents. *Wood Dec.*, ¶¶ 2, 4.

8 The Trustee has not made a decision whether to pay these maintenance fees since the  
9 Trustee is still investigating (i) whether the payment of all of these maintenance fees is desirable  
10 and (ii) whether the payment of these maintenance fees can be delayed in order to give the estate  
11 time to sell the patents and defer the payments to a purchaser. *Wood Dec.*, ¶ 5.

12 Accordingly, the Trustee seeks authority from the Court to use up to \$22,700.00 to pay  
13 the patent maintenance fees should the Trustee determine in his discretion that the payments are  
14 necessary to protect property of the estate. *Wood Dec.*, ¶¶ 6-7.

15  
16 DATED this 24<sup>th</sup> day of October, 2022.

17 **FOSTER GARVEY P.C.**

18 *s/ Deborah A. Crabbe*

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26 bankruptcy estate of UniEnergy Technologies  
LLC